UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. - : <u>INFORMATION</u>

SHERRIE WILLIAMS, : 13 Cr.

13 CRIM620

COUNT ONE

(Theft of Government Benefits)

The United States Attorney charges:

1. From in or about March 2009, up to and including in or about May 2011, in the Southern District of New York and elsewhere, SHERRIE WILLIAMS, the defendant, willfully and knowingly, did embezzle, steal, purloin, and convert to her use and the use of others, vouchers, money and things of value of the United States and a department and an agency thereof, to wit, the United States Department of Housing and Urban Development, which exceeded the sum of \$1,000, and did receive, conceal, and retain the same with intent to convert it to her use and gain, knowing it to have been embezzled, stolen, purloined and converted, to wit, WILLIAMS fraudulently obtained federal housing subsidies to which she was not entitled.

(Title 18, United States Code, Section 641.)



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FORFEITURE ALLEGATION

2. As the result of committing the theft of government benefits offense, in violation of Title 18, United States Code, Section 641, charged in Count One of this Information, SHERRIE WILLIAMS, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to at least \$13,982.40.00 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offense charged in Count One of this Information.

Substitute Asset Provision

- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the Court;
 - d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28

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U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property. (Title 18, United States Code, Section 981; Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461.)

Preet Bravava

PREET BHARARA United States Attorney Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SHERRIE WILLIAMS,

Defendant.

INFORMATION

13 Cr.

(18 U.S.C. § 641.)

PREET BHARARA
United States Attorney.